

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WALTER J. SCOTT, JR.,

Plaintiff,

- against -

BANGKO SENTRAL NG PILIPINAS;
PHILIPPINES VETERANS BANK;
BANKWISE, INC.; WISE HOLDINGS, INC.;
ALBERTO V. REYES; RICARDO A.
BALBIDO; ROBERT F. DE OCAMPO;
NONILO C. CRUZ; AND JOHN AND/OR
JANE DOES 1-20,

Defendants.

Civil Action No.
1:17-CV-02772-DLC

NOTICE OF MOTION

**DEFENDANT BANGKO SENTRAL NG PILIPINAS'S MOTION TO DISMISS BASED
ON LACK OF SUBJECT MATTER AND PERSONAL JURISDICTION UNDER THE
FSIA, IMPROPER VENUE UNDER THE FSIA AND *FORUM NON CONVENIENS*, AND
DEFENDANT ALBERTO V. REYES'S MOTION TO DISMISS BASED ON LACK OF
PERSONAL JURISDICTION AND *FORUM NON CONVENIENS***

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendants Bangko Sentral NG Pilipinas's and Alberto V. Reyes's (together, the "BSP Defendants") Motions to Dismiss the Plaintiff's Amended Complaint, dated June 28, 2017, and the accompanying Declaration of Alberto V. Reyes, the BSP Defendants will move this Court before the Honorable Denise L. Cote, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, Room 15B, New York, New York 10007, on a date and at a time designated by the Court, for an Order pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), and 12(b)(3) dismissing the Plaintiff's Amended Complaint, as well as any such other relief as the Court deems just and proper.

Dated: New York, New York
September 15, 2017

Respectfully submitted,

ALLEN & OVERY LLP

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